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5				
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	For Jan Fuechtener and F.A.J.R. Magic Trust			
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11	UNITED STATES DISTRICT COURT			
11	DISTRICT OF NEVADA			
12				
4.0	"Lily," et al.,	Case No. 2:19-cv-00352-RFB-F	ZJY	
13	Plaintiffs,	STIPULATION AND AGRE	ED ORDER	
14	Tamonis,	FOR EXTENSION OF DEFI		
	v.	DEADLINES TO RESPOND)	
15	I D E 1/	(First Request)		
16	Jan Rouven Fuechtener,			
	Defendant.			
17				
18	Stipulation fo	<u>r Extension of Time</u>		
10	This stipulation is entered into b	y the following parties: Plaintif	fs, by and	
19				
20	through their attorneys of record Carol Hepburn, Deborah Bianco, and John Kawai,			
	and Defendant Jan Fuechtener by and through his attorneys Lance J. Hendron and			
21	Zoahow I on Noveland (collectively "the Danties"). The Danties haveby stimulate and			
22	Zachary Lee Newland (collectively "the Parties"). The Parties hereby stipulate and			
0.0	agree that Fuechtener's deadlines to respond to Plaintiffs' Motion for Summary			
23				
	Stipulation and Agreed Order For Extens	ion of Times	Page 1 of 4	
	Supulation and Agreed Order For Extens	on or rimes	1 age 1 01 4	

Judgment (ECF No. 41) and Plaintiffs' Request for Judicial Notice (ECF No. 42) are extended to July 31, 2020. This is the first stipulation for an extension of time for Fuechtener to respond to these motions. The stipulated extension is requested due to the fact that Fuechtener's counsel, Zachary Newland, is out of the office for family leave and will not return to work before July 1, 2020. Additionally, Fuechtener's counsel's busy docket in early July includes a number of filing deadlines and cross-country travel for an evidentiary hearing before the U.S. District Court in Maine on July 13th. As a result of counsel's leave and other obligations, additional time is needed to allow Fuechtener to adequately consult with counsel prior to responding to Plantiffs' motions.

The Parties stipulate and agree that the time for Fuechtener to respond to Plaintiffs' Motion for Summary Judgment is extended to July 31, 2020. The Parties stipulate and agree that the time for Fuechtener to respond to Plaintiffs' Request for Judicial Notice is extended to July 31, 2020. The Parties ask that the Court approve of this stipulation and enter an order granting Fuechtener an extension of time.

CAROL L. HEPBURN P.S.

GUYMON & HENDRON

18	/s/ Carol L. Hepburn	/s/ Lance J. Hendron	
	/s/ Carol L. Hepburn Carol L. Hepburn, <i>Pro Hac Vice</i> 200 First Avenue West, #550	Lance J. Hendron	
19	200 First Avenue West, #550	Nevada State Bar No. 11151	
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20	Seattle, WA 98119 Tel: 206) 957-7272	625 S. Eighth Street	
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21	Fax: (206) 957-7273 Email: carol@hepburnlaw.net	Phone: (702) 758-5858	
	_	Email: lance@ghlawnv.com	

CARPENTER, ZUCKERMAN & BRANDON SAMPLE PLC 1 ROWLEY 2/s/John A. Kawai /s/ Zachary L. Newland Zachary L. Newland, Pro Hac Vice 3 John A. Kawai 407 Bryan Circle, Suite F Senior Litigation Counsel Ojai, CA 93023 Brandon Sample PLC 4 805-272-4001 P.O. Box 250 team3@czrlaw.com 5 Rutland. Vermont 05702 Phone: (802) 444-4357 6 Email: zach@brandonsample.com Texas Bar: 24088967 https://brandonsample.com 7 Attorneys for Jan R. Fuechtener, 8 Defendant 9 10 DEBORAH A. BIANCO, PLLC 11 /s/ Deborah A. Bianco Deborah A. Bianco, Pro Hac Vice 14535 Bel-Red Road, #201 12 Bellevue, WA 98007 425-747-4500 13 deb@debbiancolaw.com 14 Attorneys for Plaintiffs 15 AGREED ORDER GRANTING EXTENSION OF TIME 16 THIS MATTER, having come before the Court upon the Parties' stipulation, 17 and the Court having reviewed this stipulation and the files and records herein, and 18 being fully advised, based on the voluntary agreement of the parties: 19 It is ORDERED that Counsel for Defendant Jan Fuechtener shall be granted 20 21 an extension of time until July 31, 2020 to file any response to Plaintiffs' Motion for Summary Judgment. 22 23

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Stipulation and Agreed Order For Extension of Times

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1	It is further ORDERED that Counsel for Defendant Jan Fuechtener shall be
2	granted an extension of time until July 31, 2020 to file any response to Plaintiffs'
3	Request for Judicial Notice.
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5	IT IS SO ORDERED this 30th day of June, 2020.
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7	RICHARD F. BÖULWARE, II UNITED STATES DISTRICT JUDGE
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